

1 Eric D. Goldberg (SBN 157544)
2 **DLA PIPER LLP (US)**
3 2000 Avenue of the Stars
4 Suite 400 North Tower
5 Los Angeles, California 90067-4704
Tel: 310.595.3000
Fax: 310.595.3300
Email: eric.goldberg@us.dlapiper.com

Attorneys for Stillwell Madison, LLC

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

GIRARDI KEESE,

Involuntary Debtor.

Case No. 2:20-bk-21022-SK

Chapter 7

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

Date:

Time: [No Hearing Required]

Place:

PLEASE TAKE NOTICE that Stillwell Madison, LLC ("Stillwell Madison"), by and through its undersigned counsel hereby enters a notice of appearance pursuant to Rule 2002(i) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and requests that copies of all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following persons at the addresses, telephone numbers, facsimile numbers and email addresses indicated:

Eric D. Goldberg, Esq.
DLA PIPER LLP (US)
2000 Avenue of the Stars
Suite 400 North Tower
Los Angeles, CA
Tel: 310.595-3000
Fax: 310.595.3300
Email: eric.goldberg@us.dlapiper.com

1 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Bankruptcy Code section
2 1109(b), the foregoing demand includes not only the notices and papers referred to in the
3 Bankruptcy Rules specified above, but also includes, without limitation, all orders and
4 notices of any applications, petitions, motions, complaints, requests or demands,
5 hearings, answering or reply papers, memoranda and briefs in support of any of the
6 foregoing and any other document filed with, or otherwise brought before, this Court with
7 respect to the above-referenced bankruptcy proceeding, whether formal or informal,
8 whether written or oral, and whether transmitted or conveyed by U.S. mail, electronic
9 mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, or
otherwise.

10 **PLEASE TAKE FURTHER NOTICE** that, Stillwell Madison intends that neither this
11 Notice of Appearance and Request for Special Notice nor any later appearance,
12 pleading, claim or suit shall waive: (i) Stillwell Madison's right to have final orders in non-
core matters entered only after *de novo* review by a District Court Judge; (ii) Stillwell
13 Madison's right to trial by jury in any proceeding so triable in any case, controversy, or
14 proceeding related to this bankruptcy proceeding; (iii) Stillwell Madison's right to have the
15 District Court withdraw the reference in any matter subject to mandatory or discretionary
16 withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to
17 which Stillwell Madison is or may be entitled under agreements, in law or in equity,
18 including the right to contest the jurisdiction of the United States Bankruptcy Court for the
19 Central District of California over Stillwell Madison, all of which rights, claims, actions,
defenses, setoffs, and recoupments Stillwell Madison expressly reserves.

20 Dated: December 22, 2020

DLA PIPER LLP (US)

21 /s/ Eric D. Goldberg

22 Eric D. Goldberg

23 Attorneys for Stillwell Madison, LLC